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May 10, 2022

VIA ECF

Hon. Joseph C. Spero
Chief Magistrate Judge
U.S. District Court, Northern District of California
San Francisco Courthouse, Courtroom G – 15th Floor
450 Golden Gate Avenue
San Francisco, CA 94102

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Re: *Senne, et al. v. Office of the Commissioner of Baseball, et al.*
No. 3:14-cv-00608-JCS

Dear Judge Spero:

We represent Defendants in the above-referenced matter and write jointly with Plaintiffs' counsel.

The parties are pleased to inform the Court that they have reached a settlement of the matter in principle. The parties have agreed upon a confidential memorandum of understanding. The settlement is subject to ratification by the respective parties, and we are in the process of preparing the settlement documents. In light of the parties' settlement in principle:

1. The parties respectfully request that the Court adjourn the initial pre-trial conference scheduled for May 10, 2022, the trial scheduled to begin on June 1, 2022, and all related trial proceedings and submissions.
2. Plaintiffs respectfully request until July 11, 2022 to file their motion for preliminary approval of the settlement.

We thank the Court for its consideration of the parties' request.



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Respectfully submitted,

/s/ Elise M. Bloom

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cc: All Counsel (via ECF)